



WA 2891
10/17/02
4E

United States Environmental Protection Agency
Region 10 Emergency Response Unit
POLLUTION REPORT

I. HEADING

Date: October 17, 2002
Subject: Reichhold Chemicals, Inc., 3320 Lincoln Avenue, Tacoma, Washington 98421
From: Carl Kitz, On-Scene Coordinator, United States Environmental Protection Agency,
Region 10, Emergency Response Unit
Telephone: (206) 553-6709
To: See Distribution List in Section VII

POLREP No.: 1 (Initial and Final)

II. BACKGROUND

Site Identification: 10ZZ
Delivery Order No.: N/A
Response Authority:
NPL Status: Not Listed
State Notification: Washington State Department of Ecology
Action Memo Status: No action memo prepared

FILE COPY

III. SITE INFORMATION

A. Incident Category

Emergency Removal Action

B. Site Description

1. Site Location

This site is located approximately 52 acres in the Commencement Bay industrial area of Tacoma, Washington, between the Hylobos and Blair waterways. Reichhold Chemicals, Inc., is on relatively flat terrain, with generally less than five feet of topographic relief. The area was constructed in the early 1950's, by hydraulically filling the then existing salt marsh with dredge spoils from adjacent waterways.

Reichhold Chemicals, Inc., formerly operated a manufacturing facility on the property. Reichhold Chemicals, Inc., currently conducts only soil and

groundwater remediation activities on the site.

Since the Reichhold Chemicals, Inc., facility began operations in 1956, a variety of chemicals and chemical-related products have been manufactured there. The last products made at the facility were treated fiber products (TFPs). TFP production was terminated in 1990, concluding production by Reichhold at the Tacoma facility.

Reichhold Chemicals, Inc., currently operates a water treatment system for the treatment of contaminated groundwater. The site currently is a Resource Conservation and Recovery Act (RCRA) corrective action site.

2. Description of Threat

The Reichhold Chemical site is a former chemical manufacturing plant that produced various chemicals, including Pentachlorophenol. Since 1988 the site has been conducting cleanup work pursuant to a RCRA corrective action. The odor problems were believed to have come from excavation work that started on Thursday October 3, 2002. This excavation work uncovered a black odorous oily material, which was analyzed by Reichhold Chemical. Very high levels of chlorinated phenols were detected. Numerous complaints were received by the Tacoma Fire and Police Departments, and the Environmental Protection Agency. The complaints were received on October 4, 2002 through October 7, 2002, when the potential source of the odors were identified to EPA by the Tacoma Fire Department.

The Reichhold property contains five RCRA defined land disposal units. Unit 1 is the main disposal area. Unit 2 is the construction debris area. Unit 3 consists of waste water ponds 1, 2, 3, and 4. Unit 6 is the resin tank farm. Unit 24 is the pentachlorophenol (PCP) plant. The main two threats on site are PCP and polychlorinated biphenyls.

Although odor was apparently the most noticeable problem at the Reichhold site, direct exposure of PCP through skin contact may be a serious health threat. This route of exposure is possible when site workers are exposed to remediation wastes such as contaminated soils, treatment cell leachate, water treatment system sludge, iron solids, and contaminated groundwater. The major breathing exposure route of PCP is through dust.

C. Preliminary Assessment

Upon initial assessment of the site, strong odors were present at all wind directions. The main odors were coming from the old PCP plant pit area. The Tacoma Fire Department had determined that Reichhold Chemicals, Inc., was the source of the on-going odor problem in the Tacoma, Washington industrial area based on their field work, and reports from an anonymous reporting party. When entering the facility there were phenol odors from the first ditch at the old chemical plant location. Al Jeroue, manager of the site, stated that the main odor was a result of chlorinated phenols. At the office area, approximately 50 drums of PCP were stored. The site manager stated that there was not a company that

would accept these drums.

IV. RESPONSE INFORMATION

A. Situation

1. Current Situation

Based on calls made to 911 by citizens of the area as far as 20 miles from Reichhold Chemicals, Inc., EPA-OSC Carl Kitz mobilized EPA's START-2 emergency response team to the site to perform a site investigation, air monitoring, and sample analysis via the HAPSITE and Tedlar bags on October 7, 2002. The START-2 contractor also conducted air sampling activities on-site, utilizing the (PS-1) polyurethane foam (PUF) sampler to measure for vapors and particulates.

The material in question is Pentachlorophenol. Reichhold took soil samples from the old chemical plant area on October 3, 2002. Positive hits were detected for PCB's, Chlorophenol (111,000 ppm), Dichlorophenol (51,700 ppm), Trichlorophenol (21,700 ppm), and Pentachlorophenol (77,400 ppm). Reichhold Chemicals, Inc., concluded that the material in question is the same material found and remediated on site over the last several years.

Reichhold is presently working with the State of Washington's Department of Ecology on soil remediation.

2. Removal Activities

Lee Shin-Project Manager Joe Fowlow, Jeff Fowlow, David Cline Alan Jensen, Heather Brunelle Howard Zorzi-Site Safety Officer Ecology and Environment, Inc. (E & E) (206) 419-3422	Captain Mike Krueger Chris Solars Ken Nordstrom Tacoma Fire Department Hazmat Team (253) 591-5712
Carl Kitz-On-Scene Coordinator (OSC) United States Environmental Protection Agency (EPA)-Seattle Operations Office (206) 553-1671	Jim Oberlander-Water Quality Inspector Rick Fuller Tacoma Public Works Department (253) 502-2131
Glenn Vedera-Geologist Doug Kunkel-Geologist CH2M Hill (206) 390-8330	Alan Jeroue-Senior Environmental Engineer Site Manager Reichhold, Incorporated (253) 627-0408
Stan Leja Washington State Department of Ecology Project Manager (360) 407-6345	

- OCTOBER 4, 2002 At the request of EPA OSC Mike Sibley, START-2 mobilized to Des Moines, Washington, to conduct air monitoring activities utilizing the Toxic Vapor Analyzer, Multi-Rae, Draeger CMS, Chlorine Monotox, and the Single Gas Monitor. The locations were given to START-2 by the Maple Valley Fire Department. Local residents had reported chlorine and formaldehyde odors throughout the day. All results were reported to the EPA OSC along with the Maple Valley Communications Center. The source of the odors were not found.
- OCTOBER 7, 2002 After the Tacoma Fire department identified Reichhold as the source of the odor complaints, EPA OSC and START mobilized to the site at 0920 hours. The START-2 brought the Mobile Command Post along with the Level A Truck on site at Reichhold Chemicals. CH2M Hill, the consultant for Reichhold, was present conducting oversight on all START activities. Air monitoring in Level B was conducted where the former PCP plant area was using the Photoionization Detector (PID), the Radiation Alert Monitor (RAD) meter, and the Draeger CMS to monitor for chlorine and phenol. Air sampling was conducted utilizing the Vacu-Can Sampler 1000, and Tedlar Bags to analyze on the HAPSITE. Four samples were collected via the Vacu-Can Sampler and five tedlar air bag samples were collected. All results from the air monitoring were negative, along with no positive hits on the HAPSITE. Vacu-Can Samples were submitted to the laboratory for analysis.
- OCTOBER 8, 2002 At the request of the EPA OSC Carl Kitz, liquid sampling was conducted at the pit area where the old PCP plant was located by the START-2. Seven total samples were collected. Four 4- ounce jars, and 3 VOA samples were collected. The samples were submitted to a laboratory for analysis. The remaining sample and jars will be collected by START-2 upon completion of analysis by the lab.
- OCTOBER 10, 2002 To help quantify the level of contaminants in the air around the excavated areas, air sampling was conducted utilizing the Puf Hi-Volume (polyurethane foam) samplers. Five samples were collected by this method at locations that covered multiple wind directions at Reichhold Chemicals, Inc. The samples will be analyzed utilizing the EPA TO-10 A Method. The samples were collected on a 24-hour time period, and continuous 24-hour monitoring was conducted on the samples at six hour intervals.

3. **Enforcement-** Currently being evaluated.

B. Planned Removal Activities

All planned removal activities have been completed. Upon receiving results from the laboratory, a trip report will be written.

C. Next Steps

EPA will be coordinating activities with the Washington State Department of Ecology, The Puget Sound Air Pollution Control Agency, and the EPA RCRA program

V. COST INFORMATION*

EPA	\$ 1,000
START-2	<u>\$ 40,000</u>
Total Costs:	\$ 41,000

*-Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

Wastes were not generated by the START-2 under this emergency response.

VII. DISTRIBUTION

To: EPA Headquarters, Washington D.C., Attention: Terry Eby
EPA Region 10, Emergency Response Unit, Attention: Chris Field
EPA Region 10, Emergency Response Unit, Attention: OSC's, Mary Mathews
EPA Washington Operations Office, Attention: Thomas Eaton
Washington State Department of Ecology, Attention: Tiffany Yelton and Ron Holcomb

VIII. STATUS

Case Pending

PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial No. EKS94220587TDD No. 02-10-0003

Lens Type: Digital Kodak DC215Site Name: Reichhold Chemicals, Inc

Photo	Date	By	Direction	Description
1	10/07/02	PT	East	The former Pentachlorophenol plant location pit area.
2	10/07/02	PT	Northeast	RCRA landfill.
3	10/07/02	PT	Southeast	RCRA landfill.
4	10/07/02	PT	East	Salvage drums on site.
5	10/07/02	PT	West	Overfill dirt behind the office.
6	10/07/02	PT	West	Iron solids residuals.
7	10/07/02	PT	Northeast	Cell number 4.
8	10/07/02	PT	East	Residual drums of Pentachlorophenol.
9	10/07/02	PT	East	Evacuation dump site.
10	10/07/02	PT	North	Standing water at the old chemical plant (west).
11	10/07/02	PT	North	Standing water at the old chemical plant (center).
12	10/07/02	PT	Southwest	START conducting air monitoring next to standing water in pit area.
13	10/07/02	PT	South	Standing product from the pit area.
14	10/07/02	PT	South	Standing product from the pit area.

15	10/07/02	PT	Southeast	Standing product from the pit area.
16	10/07/02	PT	Southeast	Standing product from the pit area.
17	10/10/02	HB	North	Puf Sample Location 3.